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[Proposed] Attorneys for The Litigation Practice Group, PC
Debtor and Debtor in Possession

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA – SANTA ANA DIVISION

1 TO THE COURT, THE OFFICE OF THE UNITED STATES TRUSTEE, CREDITORS, AND
2 PARTIES REQUESTING SPECIAL NOTICE:

3 **PLEASE TAKE NOTICE** that The Litigation Practice Group, PC, debtor and debtor in
4 possession (“Debtor”), intends to employ Khang & Khang LLP (“K&K”), effective March 20,
5 2023 as general bankruptcy counsel to the Debtor, pursuant to 11 U.S.C. § 327(a), Rule 2014 of
6 the Federal Rules of Bankruptcy Procedure, and Local Bankruptcy Rule 2014-1(b).

7 Debtor believes that the appointment of K&K as its general bankruptcy counsel in this case
8 will be beneficial to the Estate because K&K’s services and expertise in the practice of bankruptcy
9 law will greatly assist the Debtor in carrying out its duties in an efficient and effective manner.
10 Specifically, K&K will perform the following duties:

- 11 A. Advise and counsel Debtor regarding matters of bankruptcy law;
- 12 B. Represent Debtor regarding Debtor’s legal rights and responsibilities under
13 the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, the
14 Local Bankruptcy Rules, the United States Trustee Notices and Guides, and
15 to assist Debtor in the administration of Debtor’s bankruptcy estate;
- 16 C. Advise Debtor with respect to preparing, filing and confirming of a plan of
17 reorganization;
- 18 D. Represent Debtor in proceedings or hearings before the Bankruptcy Court
19 in matters involving bankruptcy law or in litigation in the Bankruptcy Court
20 in matters relating to bankruptcy law;
- 21 E. Assist Debtor in the preparation of reports, accounts, applications and
22 orders involving matters of bankruptcy law; and
- 23 F. Assist Debtor in such other matters as may be necessary.

24 Pre-petition, on March 17, 2023 K&K was retained by Debtor and received from Debtor
25 the sum of \$80,000 as a retainer deposit (the “Deposit”) as attorneys’ fees and costs deposit for
26 legal services to be rendered and costs to be incurred on behalf of Debtor in this Chapter 11 case.
27 To date, of the Deposit, \$1,738 has been expended on the filing fee for the case, and \$13,800 has
28 been expended for time spent (27.6 hours x \$500 per hour) on prepetition consultation, document

1 review and preparation of petition and related documents initially filed in this case. The remaining
2 balance of \$64,462 is held in trust. The Debtor will pay an additional \$20,000 as retainer deposit.
3 These funds will be held in trust and will not be disbursed until a fee application is approved by the
4 Court. The customary hourly rates may be adjusted periodically to reflect the advancing
5 experience, capabilities, and seniority of professionals, as well as general economic factors.

6 Copies of the Application for Order Authorizing Employment of K&K may be obtained by
7 contacting K&K at the address and telephone number set forth on page one of this Notice.

8 **IF YOU DO NOT OBJECT TO THE APPLICATION, NO ACTION IS REQUIRED.**

9 Pursuant to Local Rule 2014-1(b)(3), any response and request for hearing, must be in the
10 form required by LBR 9013-1(f)(1), must be filed with the Court and served on the Debtor's
11 counsel, and the Office of the United States Trustee not later than 14 days from the date of service
12 of this notice. No hearing is required unless timely requested by the Office of the United States
13 Trustee, a party in interest or otherwise ordered by the Court. Any response and request for
14 hearing not timely filed and served may be deemed by the Court to be consent to the relief sought.

15 DATED: April 18, 2023

16 KHANG & KHANG LLP

17 By: /s/ Joon M. Khang
18 Joon M. Khang

19 Proposed Attorneys for
20 The Litigation Practice Group, PC
21 Debtor and Debtor in Possession

22 Mailing Date: April 18, 2023

In re: THE LITIGATION PRACTICE GROUP, PC Debtor(s).	CHAPTER 11 CASE NUMBER: 8:23-bk-10571-SC
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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: KHANG & KHANG LLP, 4000 Barranca Parkway, Suite 250, Irvine, CA 92604

A true and correct copy of the foregoing document described **NOTICE OF APPLICATION FOR ORDER AUTHORIZING EMPLOYMENT OF KHANG & KHANG LLP AS GENERAL BANKRUPTCY COUNSEL TO THE DEBTOR AND DEBTOR IN POSSESSION, THE LITIGATION PRACTICE GROUP, PC., EFFECTIVE MARCH 20, 2023** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner indicated below:

I. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING ("NEF") – Pursuant to controlling General Order(s) and Local Bankruptcy Rule(s) ("LBR"), the foregoing document will be served by the court via NEF and hyperlink to the document. On 04/18/23 I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following person(s) are on the Electronic Mail Notice List to receive NEF transmission at the email address(es) indicated below:

Service information continued on attached page

II. SERVED BY U.S. MAIL OR OVERNIGHT MAIL(indicate method for each person or entity served):

On 04/18/23 I served the following person(s) and/or entity(ies) at the last known address(es) in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States Mail, first class, postage prepaid, and/or with an overnight mail service addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

III. SERVED BY PERSONAL DELIVERY, FACSIMILE TRANSMISSION OR EMAIL (indicate method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on I served the following person(s) and/or entity(ies) by personal delivery, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

04/18/23

Joon M. Khang

Date

Type Name

/s/ Joon M. Khang

Signature

In re The Litigation Practice Group, PC
Case No.: 8:23-bk-10571-SC

NEF Service List

- **Ronald K Brown** ron@rkbrownlaw.com
- **Joon M Khang** joon@khanglaw.com
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- **United States Trustee (SA)** ustregion16.sa.ecf@usdoj.gov

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Marich Bein LLC 99 Wall Street, Ste 2669 New York, NY 10005	MarkSYS Holdings, LLC 3725 Cincinnati Ave, Suite 200 Rocklin, CA 95765
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Netsuite-Oracle 2300 Oracle Way Austin, TX 78741	Nevada Dept of Taxation 1550 College Parkway, Suite 115 Carson City, NV 89706
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Sharp Business Systems 8670 Argent St Santee, CA 92071	Streamline Performance Inc 1551 N Tustin, #555 Santa Ana, CA 92705
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